

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JENNIFER ZYNDA, AMANDA  
BALMA, KEVIN GRIFKA, BRIAN  
SAYLOR, NANCY WESSINGER,  
JORDAN MILLER, MICHELLE  
WITT, individual Plaintiffs, and  
MAURICE & JANE SUGAR LAW  
CENTER FOR ECONOMIC &  
SOCIAL JUSTICE,  
INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE AND  
AGRICULTURAL IMPLEMENT  
WORKERS OF AMERICA (UAW),  
institutional Plaintiffs

Plaintiffs,

v.

STEVE ARWOOD, in his official  
capacity as Acting Director of the  
Michigan Talent Investment Agency,  
and SHARON MOFFETT-MASSEY,  
in her official capacity as Director of  
the Unemployment Insurance Agency,

Defendants.

Case No. 2:15-cv-11449

Hon. Judge Cleland

**STIPULATED ORDER FOR  
PRELIMINARY INJUNCTIVE  
RELIEF**

---

David M. Blanchard (P67190)  
Daniel C. Tai (P76798)  
BLANCHARD & WALKER, PLLC  
Attorneys for Plaintiffs  
221 N. Main Street, Ste. 300  
Ann Arbor, MI 48104  
(734) 929-4313  
blanchard@bwlawonline.com

---

Ava Barbour (P70881)  
Edward A. Macey (P72939)  
Associate General Counsel  
International Union, UAW  
Attorneys for UAW only  
8000 East Jefferson Avenue  
Detroit, MI 48214  
(313) 926-5216

---

**STIPULATED ORDER ENJOINING COLLECTION ACTIVITY**

WHEREAS, Plaintiffs have filed the instant action On April 21, 2015, challenging the Michigan Unemployment Insurance Agency's practices relating to the detection and issuance of fraud determinations;

WHEREAS this matter is presently before the court on Plaintiffs' Motion for a Preliminary Injunction Staying Collection Activity;

WHEREAS the parties stipulate to resolution of the pending motion by this Order; and

WHEREAS collection activities by the Agency have included: wage garnishment, federal and state tax return garnishment, invoices, bills or payment plans imposed by the Agency; and

By Consent and stipulation of the parties, it is HEREBY ORDERED that during the pendency of this action, Defendants, their successors, agents, and employees shall suspend all collection activity against unemployment insurance agency claimants who have been subject to fraud (re)determinations (and associated underlying (re)determinations) issued by the Agency beginning October 1, 2013 to August 7, 2015, unless and until individually reviewed by agency staff and affirmed with new notice to claimant.<sup>1</sup>

---

<sup>1</sup> This does not include cases already affirmed through prior staff review.

IT IS FURTHER ORDERED that Defendants shall take all necessary actions to implement this ORDER as soon as practicable but in no case later than 45 days after entry of this order.

IT IS SO ORDERED.

Dated: January 11, 2017

s/Robert H. Cleland  
ROBERT H. CLELAND  
UNITED STATES DISTRICT COURT

**STIPULATION**

The parties, by and through their respective attorneys, stipulate to the entry of this order.

Respectfully submitted,

Dated: January 6, 2016

/s/ David M. Blanchard  
David M. Blanchard (P67190)  
Daniel C. Tai (P76798)  
BLANCHARD & WALKER, PLLC  
Attorneys for Plaintiffs  
221 N. Main Street, Ste. 300  
Ann Arbor, MI 48104  
(734) 929-4313  
[blanchard@bwlawonline.com](mailto:blanchard@bwlawonline.com)

Ava Barbour (P70881)  
Edward A. Macey (P72939)  
Associate General Counsel  
International Union, UAW  
Attorneys for UAW only  
8000 East Jefferson Avenue  
Detroit, MI 48214  
(313) 926-5216

/s/ "with consent of" Kimberly K. Pendrick  
Kimberly K. Pendrick (P60348)  
Assistant Attorney General  
Attorney for Defendants  
Labor Division  
3030 W. Grand Blvd., Ste. 9-600  
Detroit, MI 48202  
313-456-2200  
pendrickk@michgan.gov